IN THE UNITED STATES DISTRICT COURT

FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

UNITED STATES OF AMERICA

v.

CHESTER FLETCHER WALLACE

LESLIE CHEVONNE STOUT

1:22CR<u>378</u>-1

1:22CR<u>328</u>-2

The Grand Jury charges:

COUNT ONE

Beginning in or about September 2021, up to and including on or about May 22, 2022, the exact dates to the Grand Jury unknown, in the County of Durham, in the Middle District of North Carolina, and elsewhere, CHESTER FLETCHER WALLACE and LESLIE CHEVONNE STOUT, and divers other persons, both known and unknown to the Grand Jury, did combine, conspire, and agree with each other, to, in and affecting interstate commerce, knowingly recruit, entice, harbor, transport, provide, obtain, and maintain by any means, and benefit, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained the following individuals, as well as others, Victim 1, Victim 2, Victim 3, Victim 4, and Victim 5 (collectively the

"Victims") knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means would be used to cause the Victims to engage in a commercial sex act, in violation of Title 18, United States Code, Section 1591(a)(l); in violation of Title 18, United States Code, Section 1594(c).

COUNT TWO

Between in or about January 2021 and December 2021, the exact dates to the Grand Jury unknown, in the County of Durham, in the Middle District of North Carolina, and elsewhere, CHESTER FLETCHER WALLACE knowingly in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefitted, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained Victim 1, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause Victim 1 to engage in a commercial sex act; in violation of Title 18 United States Code, Section 1591(a)(1) and (b)(1).

COUNT THREE

Between in or about January 2022 and March 2022, the exact dates to the Grand Jury unknown, in the County of Durham, in the Middle District of North Carolina, and elsewhere, CHESTER FLETCHER WALLACE and LESLIE CHEVONNE STOUT knowingly in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefitted, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained Victim 2, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause Victim 2 to engage in a commercial sex act; in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(1).

COUNT FOUR

Between in or about October 2021 and December 2021, the exact dates to the Grand Jury unknown, in the County of Durham, in the Middle District of North Carolina, and elsewhere, CHESTER FLETCHER WALLACE and LESLIE CHEVONNE STOUT knowingly in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefitted, financially and by

receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained Victim 3, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 159l(e)(2), and any combination of such means, would be used to cause Victim 3 to engage in a commercial sex act; in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(1).

COUNT FIVE

Between in or about January 2022 and March 2022, the exact dates to the Grand Jury unknown, in the County of Durham, in the Middle District of North Carolina, and elsewhere, CHESTER FLETCHER WALLACE and LESLIE CHEVONNE STOUT knowingly in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefitted, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained Victim 4, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause Victim 4 to engage in a commercial sex act; in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(1).

COUNT SIX

Between in or about January 2021 and March 2022, the exact dates to the Grand Jury unknown, in the County of Durham, in the Middle District of North Carolina, and elsewhere, CHESTER FLETCHER WALLACE knowingly in and affecting interstate and foreign commerce, recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, and benefitted, financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained Victim 5, knowing and in reckless disregard of the fact that force, threats of force, fraud, and coercion, as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause Victim 5 to engage in a commercial sex act; in violation of Title 18, United States Code, Section 1591(a)(1) and (b)(1).

DATED: October 31, 2022

SANDRA J. HAIRSTON United States Attorney

BY: NICOLE R. DUPRE

Assistant United States Attorney

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FOREPERSON